

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF NEW HAMPSHIRE

Laurie Ortolano

v.

The City of Nashua, et al.

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Civil Action No. 22-cv-00326-LM

JOINT MOTION TO SUSPEND ALL RELEVANT DEADLINES

Now come all Parties, by and through their respective counsel, file this Motion to Suspend All Relevant Deadlines in this case. In support hereof, the Parties state as follows:

1. This case commenced with the filing of a 67 page, 10 count Complaint on August 22, 2022, in which some 11 defendants were named. In due course, several of the defendants either moved to dismiss the claims or moved for judgment on the pleadings. *See* Doc. Nos. 31, 36, 42 and 52.

2. Although the Court has ruled on two of these motions, the Motion filed by Mayor Donchess and Mr. Griffin, as well as the Motion filed by Attorneys Bolton and Leonard, remain pending.

3. The outcome of those motions may significantly impact the scope of discovery in the case. In addition, rulings thereon may have broader application to other claims and defendants.

4. While the Parties anticipated that it would take some time to resolve these motions and built time into the discovery schedule for such, it appears the Parties did not fully appreciate the Court's calendar and schedule.

5. Thus, while the May 2024 trial date (and resulting January 20, 2024 summary judgment deadline) appeared reasonable when the discovery plan was submitted on January 30,

2023 [Doc. No. 47], the Parties now believe that an extension of all relevant deadlines and an extension of the trial date will be required.

6. Rather than pick a new set of dates without certainty as to the timeline on the pending Motions, possibly requiring yet another motion, the Parties request that the Court suspend all relevant deadlines until such time as the pending motions are resolved. At that time, the Parties suggest a new scheduling conference may be necessary to address discovery, motion, and trial deadlines or, in the alternative, the Parties will submit a suggested schedule for the Court's review.

7. Counsel have advised their clients of this request.

8. No Form 3 is being submitted herewith as no dates certain are being requested at this time.

WHEREFORE, the Parties request that this Court:

- A. Grant this Motion to Suspend Deadline; and
- B. Grant such further relief as justice requires.

Respectfully submitted,

Laurie Ortolano
By counsel,

OLSON LAWYERS

**City of Nashua, Michael Carignan, and
Frank Lombardi**
By counsel,

CULLEN COLLIMORE SHIRLEY, PLLC

/s/ Kurt S. Olson
Kurt S. Olson
31 Franklin Rd.
Salisbury, NH 03268
(603) 748-1960
kolson54@gmail.com

/s/ Brian J. S. Cullen
Brian J.S. Cullen
37 Technology Way, Suite 3W2
Nashua, NH 03060
(603) 881-5500
bcullen@cullencollimore.com

Kimberly Kleiner

By counsel,

FRIEDMAN FEENEY, PLLC

/s/ Dona Feeney

Dona Feeney
95 North Street, Suite #5
Concord, NH 03301
(603) 783-5105
dfeeney@friedmanfeeney.com

James Donchess and John Griffin

By counsel,

RATH YOUNG & PIGNATELLI, PC

/s/ Michael A. Pignatelli

Michael A. Pignatelli
Adam B. Pignatelli
One Capital Plaza
P.O. Box 1500
Concord, NH 03302-1500
(603) 226-2600
apb@rathlaw.com
map@rathlaw.com

Steve Bolton and Celia Leonard

By counsel,

UPTON & HATFIELD, LLP

/s/ Russell F. Hilliard

Russell F. Hilliard
Brooke Lovett Shilo
159 Middle Street
Portsmouth, NH 03801
(603) 436-7046
rhilliard@upton-hatfield.com
bshilo@upton-hatfield.com

Inception Technologies and Raymond Feoli

By counsel,

CORRIGAN LAW OFFICES, PC

/s/ Brian Corrigan

Brian Corrigan
122 Chestnut Street
P.O. Box 1782
Andover, MA 01810
(978) 988-1544
Corriganlaw@gmail.com

CERTIFICATE OF SERVICE

I certify that a copy of this filing was served via the Court's ECF filing system upon counsel of record.

Dated: September 18, 2023

By: /s/ Brian J.S. Cullen

Brian J.S. Cullen